

COMPARISON OF FHWA/FTA, UMTA and CCHRO Title VII Affirmative Action Plan Contents

HB 5323
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Based on AFFIRMATIVE ACTION PLAN REGULATIONS
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<u>CCHRO</u>	<u>FHWA</u>	<u>UMTA / FTA</u>
<p><i>Sec. 46a-68-33. Policy Statement</i></p> <ul style="list-style-type: none">○ Purpose & need for affirmative action○ Distinction between AA & equal EEO○ Lists federal & state constitutional provisions, laws, regulations, guidelines, and executive orders that prohibit or outlaw discrimination and identifies each class of persons protected thereunder○ Outlines each step of employment process and addressed role of AA plays at each stage○ Establishes AA & EEO as immediate & necessary agency objectives○ Pledges the agency to affirmatively provide services & programs in a fair & impartial manner○ Recognized hiring difficulties experience by physically disabled and older persons & sets program goals to overcome present effects of past discrimination○ Identifies the agency AAO by name, position, address, and telephone number.○ Policy statement is signed and dated by appointing authority and evidence his/her commitment to achieve goals within the plan.○ Policy shall be revised to reflect changes in federal and anti-discrimination laws or other changes consistent with Sections 46a-68-31 through 46a-68-74, inclusive.	<p><i>23 CFR §230, Subpart C, Appendix A</i></p> <p><i>Policy Statement</i></p> <ul style="list-style-type: none">○ Assignment specific responsibility and accountability to each executive, manager, and supervisor.○ EEO for all persons, regardless of race, color, religion, sex or national origin○ Personal commitment to and support of EEO by the State Highway Agency (SHA)○ Require AA be taken throughout the agency to overcome the effects of past discrimination○ EEO program be a goal setting program with measurement & evaluation factors similar to other major agency programs○ EEO in all employment practices, including (but not limited to) recruiting, hiring, transfers, promotions, training, compensation, benefits, recognition (awards), layoffs, and other terminations.○ Responsibility for positive AA in the discharge of EEO programs, including performance evaluations of managers & supervisors in such functions○ Accountability for action or inaction in the area of EEO by management personnel.	<p><i>Section 19 of the UMT Act</i></p> <p><i>Policy Statement</i></p> <ul style="list-style-type: none">○ Commitment to EEO for all persons, regardless of race, color, creed, national origin, sex, or age. The agency may include handicap.○ Commitment to undertake an AAP including goals and timetables, in order to overcome the effects of past discrimination on minorities and women○ Responsibility for the implementation of the EEO program is assigned to an agency executive (EEO Director/Manager)○ All management personnel share in the responsibility and are assigned specific tasks to assure compliance is achieved○ Applicants and employees have the right to file complaints alleging discrimination with the appropriate official○ Performance by managers, supervisors, etc., will be evaluated on the success of the EEO program○ Successful achievement of EEO goals provide benefits to the recipient through fuller utilization and development of previously underutilized human resources.
<p><i>Sec. 46a-68-34 Internal Communication</i></p> <ul style="list-style-type: none">○ The Policy Statement and a summary of the objectives of the plan shall be posted and distributed annually to all employees.○ All internal communications shall include notice that employees have the right to a reasonable period of review and comment upon the agency AAP. All comments are to be addressed to the AAO, who shall be identified by name and address in all communications.○ Copies of all internal communications & comments received will be maintained and note the date comments were received.○ The plan shall state the period of time employees have been given to review and comment on the AAP and shall include a summary of comments received.	<p><i>Internal Communication</i></p> <ul style="list-style-type: none">○ Publicize the AAP internally○ Distribute written communications from the head of the SHA○ Include the AAP and the EEO policy statement in the agency operations manual○ Hold individual meetings with managers and supervisors to discuss the program, their responsibilities and to review progress○ Place Federal and State EEO posters on bulletin boards near time clocks and in personnel offices.○ Publicize the AAP in the agency newsletters and other publications○ Present and discuss the AAP as part of employee orientation and training programs	<p><i>Internal Communication</i></p> <ul style="list-style-type: none">○ Written communication from the CEO○ Inclusion of the EEO program and policy in the agency's personnel operation's manual○ Meetings held (at least semiannually) with managers & supervisors to discuss the EEO program and its implementation○ Posting official EEO posters and the policy statement on bulletin boards, near time clocks, cafeteria, and personnel offices○ Include EEO policy in employee handbooks, reports, manuals, and union contracts○ Meet with minority and female employees to get their suggestions in implementation of the EEO program○ Present and discuss EEO Program as part of employee orientation

	<ul style="list-style-type: none"> ○ Invite employee organization representatives to cooperate and assist in the development and implementation of the AAP. 	<ul style="list-style-type: none"> ○ and in training programs. ○ Identify the EEO Manager by name in all internal communications regarding the agency's EEO program.
<p>Sec. 46a-68-35 External Communication</p> <ul style="list-style-type: none"> ○ Agency shall be put on public record as an AA/EEO employer ○ Notice of job availability shall be sent regularly to recruiting sources and organizations capable of referring qualified applicants ○ All bidders, contractors, subcontractors, and suppliers shall be notified of the agency's AA policy. Notice shall include statement that the agency will not do business with anyone who discriminates against members of any class protected under <i>Section 4a-60 of CGS</i>. ○ Employment advertising shall omit reference to age or gender (except in cases of <i>BFOQ</i>) and shall clearly convey the desire to employ members of protected classes. ○ Notice that the agency is an AA employer shall be sent to all unions which represent agency employees and shall invite review and comment upon the AAP. ○ Aggressive/positive relationship building to develop additional recruiting resources ○ Participation of MBE meeting qualifications established in regulations issued pursuant to <i>Sections 4a-61 or 32-9f of CGS</i> or federal law shall be solicited and encouraged. ○ Publication sources shall include media that target a protected class audience in LMAs most relevant for filling vacant positions ○ The Commissioner of DAS shall bargain in good faith for inclusion of nondiscrimination & AA clauses in all collective bargaining agreements to which the state or agency is a party ○ Agency shall bargain with DAS and DECD to coordinate and unify activity undertaken to eliminate duplication of effort and expense ○ Agency shall maintain name, address, dates of communications/outreach, of all organizations, recruiting sources, bidders, contractors, suppliers, etc. ○ Where cooperation of another agency is essential to the implementation of an activity, the agency shall keep record of contact and outcome. ○ The AAP shall summarize activity undertaken by the agency during the reporting period to comply with this section. 	<p>External Communication</p> <ul style="list-style-type: none"> ○ Distribute AAP to minority groups and women's organizations, community action groups, appropriate state agencies, professional organizations, etc. ○ Active recruitment efforts to support and supplement department reaching all appropriate sources to obtain qualified employees on a nondiscriminatory basis ○ Maintaining contracts with organizations representing minority groups, women, professional societies, and other sources of candidates for technical, professional and management level positions ○ Reviewing and monitoring recruitment and placement procedures so as to assure that no discriminatory practices exist 	<p>External Communication</p> <p>Disseminate the EEO policy and programs to regular recruitment sources, i.e.;</p> <ul style="list-style-type: none"> ○ employment agencies, hiring halls, unions, educational institutions, minority, handicapped, and women's organizations; civil rights organizations, community action groups, training organizations, and others who refer applicants ○ public media sources, radio and TV stations, newspapers, magazines, and other journals (especially those oriented to the handicapped and minority populations) ○ All advertisements for personnel should include a statement that the recipient is an "EEO Employer". ○ Identify the EEO Manager by name in all external communications regarding the agency's EEO program.
<p>Sec. 46a-68-36 Assignment of Responsibility</p> <ul style="list-style-type: none"> ○ The ultimate responsibility for promoting and enforcing AA rests with the appointing authority, who shall account for the success or 	<p>Assignment of Responsibility</p> <ul style="list-style-type: none"> ○ The head of each SHA is responsible for the overall administration of the internal EEO program, including the total integration of 	<p>Assignment of Responsibility</p> <ul style="list-style-type: none"> ○ An executive or manager should be appointed as Manager/Director of EEO who reports and is directly responsible to the agency's

<p>failure of the plan.</p> <ul style="list-style-type: none"> ○ The appointing authority may assign the development and implementation of the AA plan to any employee. ○ The appointing authority shall schedule regular meetings that emphasize human and intergroup relations, nondiscriminatory employment practices, legal authority to AA and commitment thereto, review of the AA plan, identification of obstacles in meeting goals ○ Agency should appoint a full or part-time AAO to report directly to the appointing authority on all matters concerning the plan and shall have access to all records and personnel necessary for the effective performance of his/her duties ○ The AAO shall develop, maintain, and monitor the plan; maintain contact with recruiting sources and organizations serving protected classes; inform the agency of developments in AA law ○ An agency with 100 or more employees shall consider the feasibility of establishing an employee advisory committee to consider any matter appropriate to the development of the AA plan. The members should include representatives from a geographical, occupational category, and protected cross-section of the workforce. ○ The agency shall evaluate and monitor the AA performance of any employee assigned AA duties ○ No employee shall be coerced, intimidated or retaliated against for performing any duties cited in this section. ○ The agency shall maintain a record of each person performing any duty related to the development and implementation of the AA plan by name, job title, percentage of time devoted to AA duties, and outline specific duties. ○ The agency shall maintain a record of each member of the advisory committee by name, race, sex, position title, and percentage of time devoted to AA duties. Minutes of all meetings and recommendations. If the agency feels the advisory committee is unnecessary to the development or implementation of the plan, the plan shall state the basis for such conclusion. ○ The plan shall indicate what steps the agency took to satisfy the requirements of this section and include all comments and recommendations made by the advisory committee. 	<p>equal opportunity into all facets of personnel management. However, specific program responsibilities should be assigned for carrying out the program at all management levels.</p> <ul style="list-style-type: none"> ○ The head of the SHA should appoint a qualified AAO with responsibility and authority to implement the internal EEO program. Managing the program requires a major time commitment and cannot be added on to an existing full-time job. ○ Responsibilities of the AAO should include: <ol style="list-style-type: none"> 1. Developing the AA Plan. 2. Publicizing the content internally and externally. 3. Assisting managers and supervisors in collecting and analyzing employment data, identifying problem areas, setting goals and timetables and developing programs to achieve goals. Programs should include specific remedies to eliminate any discriminatory practices discovered in the employment system. 4. Handling and processing formal discrimination complaints. 5. Designing, implementing and monitoring internal audit and reporting systems to measure program effectiveness and to determine where progress has been made and where further action is needed. 6. Reporting, at least quarterly, to the head of the SHA on progress and deficiencies of each unit in relation to agency goals. 7. Consider the creation of: <ul style="list-style-type: none"> • An EEO Advisory Committee, whose membership would include top management officials; • An EEO Employee Committee, whose membership would include rank and file employees, with minority and female representatives from various job levels and departments to meet regularly with the AAO; • An EEO Counseling Program to attempt informal resolution of discrimination complaints. 	<p>CEO. The EEO Manager should be given top management support and assigned a staff commensurate with the importance of this program.</p> <ul style="list-style-type: none"> ○ The EEO Manager shall be sensitive to and have an awareness of the varied ways discrimination occurs; have a total commitment to EEO program goals and objectives; knowledge of civil rights precepts, policies, rules, regulations, and guidelines; and sufficient authority and ability to work and communicate with others to achieve EEO goals and objectives. <p><u>EEO program responsibilities should include</u></p> <ul style="list-style-type: none"> ○ developing and recommending the EEO policy, a written EEO program, and internal and external communications procedures ○ assisting management in collecting and analyzing employment data, identifying problem areas, setting goals and timetables, and developing programs to achieve goals ○ designing, implementing, and monitoring internal audit and reporting systems to measure program effectiveness and to determine where progress has been made and where further action is needed ○ reporting periodically to the CEO on progress of each unit in relation to the agency's goals ○ serving as a liaison between the agency, Federal, State, and local governments, regulatory agencies, minority, handicapped and women's organizations, etc. ○ assuring the current legal information affecting AA disseminated to responsible officials ○ assisting in recruiting minority, handicapped and women applicants and establishing outreach sources for use by hiring officials ○ concurring in all hires and promotions ○ processing employment discrimination complaints. <p><u>Managers' Responsibility</u></p> <ul style="list-style-type: none"> ○ All managers have the responsibility of ensuring that the agency's EEO policies and programs as outlined in the EEO program are carried out, i.e., assisting in identifying problem areas and establishing agency and unit goals and objectives; being actively involved with local minority organizations, women's and handicapped groups, community action organizations designed to promote EEO; participating actively in periodic audits of all aspects of employment in order to identify and to remove barriers obstructing the achievement of specified goals and objectives; holding regular discussions with other managers and employees to assure policies are being followed; reviewing qualifications of
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		employees to assure that all minorities, women, and handicapped persons are given full opportunities for transfers, promotions, training, salary increases, and other forms of compensation; participating in the review and/or investigation of complaints alleging discrimination; conducting and supporting career counseling; and participating in periodic audits to ensure that each unit is in compliance with displaying EEO posters properly on employee bulletin boards.
<p><i>Sec. 46a-68-37 Organizational Analysis</i></p> <ul style="list-style-type: none"> ○ Each agency shall prepare a job title and occupational category study in the following manner: <ol style="list-style-type: none"> 1) <u>Job Title Study</u> – each office, position and position classification authorized by the department of administrative services or established by statute shall be arranged into lines of progression that depict the order of jobs through which an employee may advance. Titles without promotional opportunity shall be listed separately. Unclassified titles shall be so identified. 2) <u>Occupational category study</u> – Each office, position and position classification listed in the job title study shall be placed in an occupational category with other offices, positions or position classifications having similar job content, compensation schedules and opportunity. Titles within an occupational category shall be ranked from the highest to lowest compensation schedule. The salary range for each office, position and position classification shall be noted. ○ After a plan has been approved by the commission, a job title or occupational category study shall not be required to be revised in a subsequent plan, unless a line of progression has been restructured, the job content of the office, position or position or a compensation has been revised, a job title has been deleted or added or a compensation schedule has been amended. 	<p><i>Organizational Analysis</i></p> <p>The AAP should include specific provisions for:</p> <ol style="list-style-type: none"> 1) Periodic classification plan reviews to correct inaccurate position descriptions and to ensure that positions are allocated to the appropriate classification. 2) Plans to ensure that all qualification requirements are closely job related. 3) Efforts to restructure jobs and establish entry level and trainee positions to facilitate progression within occupational areas. 	<p><i>Organizational Analysis</i></p> <p>Refer to Utilization Analysis Section.</p>
<p><i>Sec. 46a-68-38 Workforce Analysis</i></p> <ol style="list-style-type: none"> a) Each agency shall report the racial and sexual composition of its full-time employees for each office, position and position classification identified in the job title study on forms provided by the commission (Form 38A). A separate analysis shall be performed for part-time and other employees. The work force analysis shall inventory the: b) total agency work force by occupational category; c) total agency work force by office(s), position(s) and position classification(s) within each occupational category; d) agency work force in each labor market area by occupational category; and 	<p><i>Workforce Analysis</i></p> <p>State highway agencies shall use the EEO-4 Form in providing current work force data. This data shall reflect only State department of transportation/State highway department employment.</p>	<p><i>Workforce Analysis</i></p> <p>The work force analysis requires a statistical breakdown of the recipient's work force by each department, job category (e.g., Officials/Managers, Clericals, Dispatchers, Bus Operators, Mechanics, Bus Cleaners, etc.), grade/rank of employee (e.g., Road Supervisor, I or II; Mechanic, A or B; etc.), and job title. Each of the above should be cross-referenced by race, national origin, and sex. This analysis should be structured in lines of progression by departmental units to insure that promotional opportunities will be considered. A table or chart is recommended for formulating this analysis.</p>

<p>e) Agency work force in each labor market area by office(s), position(s) and position classification(s) within each occupational category.</p> <p>f) Each agency shall report, in 5 year increments, the age groupings of its full-time work force by occupational category.</p> <p>g) Each agency shall report the number of physically disabled persons in its full-time work force by occupational category.</p>		
<p><i>Sec. 46a-68-39 Availability Analysis</i></p> <p>a) As a preparatory step in determining whether protected classes are fully and fairly utilized in the work force, each agency shall conduct, at a minimum, an analysis by occupational category to determine the availability base of protected group members for employment. A separate availability analysis shall be conducted for any position classification within an occupational category employing a significant number of persons. Ordinarily, a position classification with 25 or more employees within a labor market area will require a separate analysis. A separate analysis may be performed for any job title requiring unique skills, abilities or educational qualifications. The availability analysis shall:</p> <ul style="list-style-type: none">(1) examine the job content of each office; position and position classification within an occupational category or, where appropriate, the job content of a position classification;(2) identify a relevant labor market area; and(3) match each office, position and position classification within an occupational category or, where appropriate, a position classification, with the most nearly parallel job title contained in the data source consulted. <p>b) In calculating availability, the following information and data sources shall be consulted:</p> <ul style="list-style-type: none">(1) employment figures;(2) unemployment figures; and(3) the racial and sexual composition of persons in promotable and/or transferable offices, positions and position classifications. <p>c) In calculating availability, the following information and data sources may be consulted:</p> <ul style="list-style-type: none">(1) population figures;(2) client population figures;(3) figures for educational, technical and training program graduates and participants; and/or(4) any other relevant source. <p>d) Agencies may elect to conduct availability analyses by age, physical disability, or other protected class status recognized in Chapter 814c of the Connecticut General Statutes.</p>	<p><i>Availability Analysis</i></p> <p><u>Employment Statistical Data</u> –</p> <p>As a minimum, furnish the most recent data on the following:</p> <ul style="list-style-type: none">1) The total population in the State,2) The total labor market in the State, with a breakdown by racial/ethnic identification and sex, and3) An analysis of (1) and (2) above, in connection with the availability of personnel and jobs within SHA's.	<p><i>Availability Analysis</i></p> <p>Refer to Utilization Analysis Section.</p>

<p>e) For each occupational category, position classification or job title analyzed, the plan shall provide the name of each source consulted and explain the basis for selection of each source. Additionally, where job titles in the source consulted area not identical to the job titles employed by the agency, the plan shall document the job titles deemed most parallel to office(s), position(s), and position classification(s) within an occupational category or, where appropriate, position classification or job title, and substantiate the manner in which the availability base is calculated.</p> <p>f) As part of its review under Sections 46a-68-51 through 46a-68-65, the commission reserves the right to determine the appropriateness of an availability base computed by an agency, including the right to accept or reject any information or data source, and to require an availability analysis by position classification or job title.</p>		
<p><i>Sec. 46a-68-40 Utilization Analysis</i></p> <p>a) To determine whether protected classes are fully and fairly utilized, the representation of protected group persons in the work force shall be compared to the availability of such persons for employment. Comparisons between the agency work force and the availability base calculated in Section 46a-68-39 shall be made by occupational category, position classifications employing a significant number of persons and job titles for which a separate base was calculated. Such analyses shall be performed for each relevant labor market area on forms made available by the commission for this purpose.</p>	<p><i>Utilization Analysis</i></p> <p>Refer to Availability Analysis Section.</p>	<p><i>Utilization Analysis</i></p> <p>The purpose of the utilization analysis is to identify those job categories where there is an underutilization and/or concentration of minorities and women in relation to their availability in the relevant labor market. It is also to establish the framework for goals and timetables and other affirmative actions to correct employment practices that contributed to any identified absence, underutilization, or concentration.</p> <p>1) A <u>utilization analysis</u> consists of a work force analysis and an availability analysis. The work force analysis requires a statistical breakdown of the recipient’s work force by each department, job category, and job title. Each of the above should be cross-referenced by race, national origin, and sex. This analysis should be structured in lines of progression by departmental units to insure that promotional opportunities will be considered. A table or chart is recommended for formulating this analysis. Also, principal duties and rates of pay must be indicated for each job category, grade/rank of employee, and job title for each employee. Where auxiliary duties are assigned, or where more than one rate of pay applies because of length of time in the job or other factors, a special notation should be made. Where the applicant, recipient, or subrecipient operates more than one shift or assigns employees within each shift to varying locations, indicate the number by race, national origin, and sex of each shift and in each location.</p> <p>2) An <u>availability analysis</u> is a comparison of the participation rates of minorities and women at various levels in the work force with their availability in relevant labor markets. A labor market has both geographic and occupational components. Different geographic areas and labor force data should be used for different job categories. As an example, professional positions would likely have a regional or</p>

		<p>national recruiting area as opposed to a local recruiting area as would be the case for less skilled jobs. Moreover, recruiting areas should reflect nearby concentrations of minority-group persons who may have been historically excluded from consideration.</p> <p>3) <u>Occupational data</u> (in addition to general population and unemployment information), along with training and promotional availability of persons for those employment opportunities from which minorities and women have traditionally been excluded. In determining availability for job categories not requiring special skills or abilities, general population or work force age data may be suitable. Community and area labor statistics by race, national origin, and sex can be obtained from the U.S. Department of Commerce, Bureau of the Census, and its publications; U.S. Department of Labor, Bureau of Labor Statistics, and the Women’s Bureau; State and Local governments, especially State employment services and MPOs. Detailed occupational data by race, national origin and sex, in categories required for EEO reports (e.g., Professionals, Officials and Managers, Technicians, Office and Clerical Workers, Craft Workers) is available in special affirmative action data packages from many State employment services. Similar data is available from the Research and Analytical Services Staff of EEOC.</p> <p>4) Applicants, recipients, subrecipients, or contractors should present this data in a table or chart form for the job categories and job titles being analyzed. Data used should be the most recent, accurate, and relevant. Also, in assessing availability and projecting goals from such availability, the program should also indicate the data given the greatest weight and reasons underlying the decision.</p> <p>5) In performing the work force and availability analyses, the applicant, recipient, or subrecipient should have racial data cross-classified by sex to ascertain the extent to which minority-group women or minority-group men may be underutilized. Likewise, minority-group data should be broken down by specific racial groups (i.e., Black, Hispanic, Asian and Pacific Islander, and American Indian or Alaskan Native).</p>
<p><i>Sec. 46a-68-41 Hiring/Promotion Goals and Timetables</i></p> <p>a) For each instance of underutilization identified in the utilization analysis, separate hiring or promotion goals, as appropriate, shall be set to increase the representation of protected class members in the agency work force. Ordinarily, a hiring goal shall be set for job titles filled through original appointment, and a promotional goal shall be set for job titles filled through promotional appointment. The objective of such goals shall be to attain parity with the availability base for such persons in the relevant labor market area. Goals to reach parity shall be established within timetables designed as long term and short term.</p>	<p><i>Hiring/Promotion Goals and Timetables</i></p> <p><u>Program Evaluation</u> – An internal reporting system to continually audit, monitor, and evaluate programs is essential for a successful AAP. Therefore, a system providing for EEP goals, timetables, and periodic evaluations needs to be established and implemented. Consideration should be given to the following actions:</p> <p>a) Defining the major objectives of EEO program evaluation.</p> <p>b) The evaluation should be directed toward results accomplished, not only at efforts made.</p> <p>c) The evaluation should focus attention on assessing the adequacy of</p>	<p><i>Hiring/Promotion Goals and Timetables</i></p> <p>Goals and timetables are an excellent management tool to assist in the optimum utilization of human resources. Specific and detailed percentage and numerical goals with timetables must be set to correct any underutilization of specific affected classes of persons identified in the utilization analysis. Usually, long-range goals will be designed to eliminate underutilization in job categories where it has been identified. Based on utilization analysis, the recipient/subrecipient/contractor should establish goals and timetables designed to correct any identified deficiencies. The goals and timetables should be attainable, in terms of analysis and the entire</p>

- b) The short term hiring/promotion goal shall be obtained by consideration of the following factors:
 - 1) the number of actual vacancies within the occupational category or job title;
 - 2) the number of projected vacancies, derived from employee turnover rates;
 - 3) the number of anticipated hires/promotions;
 - 4) the number of actual hires/promotions;
 - 5) the extent of underutilization; and
 - 6) the probable success of program goals in enhancing the availability of protected class members for employment.
- c) The long term hiring goal shall be obtained by subtracting the short term hiring goals and the short term promotion goals, including upward mobility goals, from the parity figure.
- d) Goals so set shall be meaningful, measurable and reasonably attainable. Goals shall be rounded up or down to the closer whole number. Ordinarily, a short term goal for each race/sex group shall not be less than 1/5 of parity or the long term goal less than parity.
- e) Where a vacancy in a job title may be filled through either a hire or promotion, as provided in Section 5-228 or elsewhere in the CGS, the agency shall compare the representation of an underutilized race/sex group in the job title(s) from which a promotion could be made to the availability base for the same group in the relevant labor market area. If the representation of an underutilized race/sex group in the job title(s) from which the promotion could be made exceeds the availability base, a promotion goal shall be set. If the availability base exceeds the representation rate in the lower job title(s) a hiring goal shall be set. Where 2 or more race/sex groups are underutilized and the availability base of 1 group exceeds the representation rate in the lower job title(s), but the representation rate for another group exceeds the availability base, the agency shall set a hiring or promotion goal, as the case may be, for the race/sex group most underutilized.
- f) Where the underutilization of race/sex groups, considered individually, does not rise to the level to require a hiring/promotion goal, but where the underutilization of race/sex groups, considered collectively, is sufficient to require that a goal be set, a hiring or promotional goal, as determined in the manner set forth in subsection (e) herein, shall be set for the race/sex group most underutilized in the occupational category, position classification or job title under consideration or for the race/sex group with the highest availability base, as the agency elects.

- problem identification in the AAP and the extent to which the specific action steps in the plan provide solutions.
- d) The AAP should be reviewed and evaluated at least annually. The review and evaluation procedures should include, but not be limited to, the following:
 - 1) Each bureau, division or other major component of the agency should make annual and such other periodic reports as are needed to provide an accurate review of the operations of the AAP in that component.
 - 2) The AA Officer should make an annual report to the head of the SHA, containing the overall status of the program, results achieved toward established objectives, identity of any particular problems encountered and recommendations for corrective actions needed.
 - e) Specific, numerical goals and objectives should be established for the ensuing year. Goals should be developed for the SHA as a whole, as well as for each unit and each job category.

program of affirmative action, to remedy existing employment practices that may unjustifiably be contributing to underutilization. In establishing the size of goals and the length of timetables, the recipient/subrecipient/contractor should consider results which can reasonably be expected from putting forth every good faith effort to make the overall affirmative action program work. If goals and timetables are not met, there is an obligation to justify this failure following the recipient's annual evaluation of the EEO program. The justification for failing to meet a goal(s) should address such factors as: whether the anticipated job openings materialized, the availability of persons whose employment could have resulted in the goal(s) being achieved, and the adequacy of recruitment and other affirmative actions to change existing employment practices so that the goal(s) could be achieved.

Long-range goals are usually stated as percentages, although numerical projections are recommended where feasible. Such goals should consider the fact that availability of traditionally underutilized or underemployed groups is not constant. Future projections should be taken into consideration. Generally, an EEO program will be formulated with long-range goals to be attained within a period of 4-5 years.

Short-term or intermediate numerical goals should be set and pursued in order to assure accomplishment of long-range goals. Short-term goals represent the net increase in minority and/or women's employment in a particular job category within the next 12 months. Short-term goals should be stated, both as actual numbers and percentages, and should be based on anticipated job openings, job group availability, and the long-range goals set for minorities and/or women in the particular job category. Projections of vacancies should also be established in terms of a job progression chart in order to determine which vacancies can be filled immediately by underutilized persons and the possibilities of these persons being promoted into upper-level positions in terms of long-range goals.

Short-term or intermediate goals should be weighted and established so that they are likely to produce the greatest results. As an example, if the recipient/subrecipient/contractor has no members of a specific affected group in a particular job classification, initial short-term goals should be set higher to maximize the expectation of recruitment and selection from the affected group. On the other hand, if the employer has a good representation of traditionally underutilized groups in the lower steps of the job progression, and members of each affected group are moving into higher steps of the job progression with regularity, a lower allocation of openings at the upper level may be adequate.

		<p>In developing goals and timetables to correct underutilization, the employer should use the following guidelines for goal setting:</p> <ol style="list-style-type: none">1) Involve personnel staff, department and division heads, local and unit managers in the process;2) Set goals that are significant, measurable, and attainable;3) Make goals with timetables specific for planned results;4) Consider anticipated attrition, expansion, contraction (especially the impact on employment of projected contracting out and privatization/competitiveness activities), turnover in the work force, and availability of persons with required skills;5) Consider effects of changes in existing employment practices that may contribute to underutilization in increasing availability of minorities and women; and6) Goals should not be rigid and inflexible, but must be targets reasonably attainable by applying every good faith effort to make all aspects of the affirmative action program work. <p>Monitoring and reporting system, which is discussed later in this section should be utilized to prescribe and revise short-term goals. The system should allow for revision of long-range goals to reflect availability of traditionally underutilized persons.</p> <p>Agencies must analyze in detail all employment practices relating to recruitment, selection, salaries, promotions, terminations, standards of discipline, seniority, maternity/paternity leave, height and weight requirements, etc. All problems must be noted and a proposed course of remedial action must be enumerated in the agency's submitted EEO program. Agencies are urged to consult EEOC, Federal Sector Programs Office, Washington, D.C., for further guidance in the development of EEO programs.</p>
<p><i>Sec. 46a-68-42 Employment Analysis</i></p> <p>Each agency shall undertake a comprehensive review of the employment process to identify policies and practices that perpetuate or build barriers to equal employment opportunity. For each instance of underutilization in an occupational category or position classification employing a significant number of persons or job title for which a separate availability base is calculated, as found in 46a-68-40, separate employment analyses shall be conducted to target the cause of the imbalance. The agency shall then design specific corrective measures, in the form of persons or position classification for which a separate availability base is calculated has experienced an increase or reduction in force, the agency shall examine its personnel policies and practices to identify those nonquantifiable aspects of</p>	<p><i>Employment Analysis</i></p> <p><u>Recruitment and Placement</u></p> <ol style="list-style-type: none">1) Active recruitment efforts to support and supplement those of the central personnel agency or department, reaching all appropriate sources to obtain qualified employees on a nondiscriminatory basis.2) Maintaining contracts with organizations representing minority groups, women, professional societies, and other sources of candidates for technical, professional and management level positions.3) Ensuring that recruitment literature is relevant to all employees, including minority groups and women.4) Reviewing and monitoring recruitment and placement procedures so as to assure that no discriminatory practices exist.	<p><i>Employment Analysis</i></p> <p>A detailed assessment of present employment practices to identify those practices that operate as employment barriers and unjustifiably contribute to underutilization. All problem areas must be identified and a proposed program of remedial, affirmative actions enumerated in the agency's submitted EEO program. The assessment and identification of problem areas should evaluate the impact of the agency's employment practices on all of its employment patterns including recruitment, selection, promotion, termination, transfer, layoff, disciplinary action, compensation and benefits, training, etc. This assessment should include the following:</p> <ol style="list-style-type: none">1) A narrative description and an analysis of all recruitment and employment selection procedures from the agency's last EEO

<p>the employment process which may impede or prevent the full and fair participation of protected race/sex group members in the employment process. The following aspects of the employment should be addressed: employment applications; job qualification; job specifications; recruitment practices; personnel policies; job structuring; orientation; training; counseling; grievance procedure; evaluation; layoffs; and termination.</p> <p>(1) Employment Process Analysis – the agency shall determine whether the number of persons employed in an occupational category, position classification employing a significant number of persons or a job title for which a separate availability base is calculated has increased or decreased from the previous reporting period through hire, termination or other personnel activity. Each instance of expansion or reduction in personnel shall be noted on the appropriate line of form 42A1 best characterizing the change. Such analysis shall be conducted regardless of whether there has been a net gain or loss of employees.</p> <p>(2) Applicant Flow Analysis – appointments to job titles within an underutilized occupational category, position classification employing a significant number of persons or job title for, which separate avail is calculated shall be further addressed in form 42A2. The flow chart shall track applicants through the hiring or promotional process to identify the step at which they were no longer a candidate for employment. Information shall be provided as required for reductions in force.</p> <p>(3) Personnel Evaluation Analysis – Each agency shall further provide information by occupational category on all matters not involving hires or reductions in force as appears on form 42A3.</p> <p>(4) Training Analysis – all training activity shall be reported on Form 42A4.</p>	<p>5) Cooperating with management and the central personnel agency on the review and validation of written tests and other selection devices.</p> <p>6) Analyzing the flow of applicants through the selection and appointment process, including an analytical review of reasons for rejections.</p> <p>7) Monitoring the placement of employees to ensure the assignment of work and workplace on a nondiscriminatory basis.</p> <p><u>Promotions</u></p> <p>1) Establishing an agency-wide merit promotion program, including a merit promotion plan, to provide equal opportunity for all persons based on merit and without regard to race, color, religion, sex or national origin.</p> <p>2) Monitoring the operation of the merit promotion program, including a review of promotion actions, to assure that requirements, procedures, and practices support EEO program objectives and do not have a discriminatory impact in actual operation.</p> <p>3) Establishing skills banks to match employee skills with available job advancement opportunities.</p> <p>4) Evaluating promotion criteria (supervisory evaluations, oral interviews, written tests, qualification standards, etc.) and their use by selecting officials to identify and eliminate factors which may lead to improper “selection out” of employees or applicants, particularly minorities and women, who traditionally have not had access to better jobs. It may be appropriate to require selecting officials to submit a written justification when well qualified persons are passed over for upgrading or promotion.</p> <p>5) Assuring that all job vacancies are posted conspicuously and that all employees are encouraged to bid on all jobs for which they feel they are qualified.</p> <p>6) Publicizing the agency merit promotion program by highlighting breakthrough promotions, i.e., advancement of minorities and women to key jobs, new career heights, etc.</p> <p><u>Training</u></p> <p>1) Requiring managers and supervisors to participate in EEO seminars covering the AAP, the overall EEO program and the administration of the policies and procedures incorporated therein, and on Federal, State, and local laws relating to EEO.</p> <p>2) Training in proper interviewing techniques of employees who conduct employment selection interviews.</p> <p>3) Training and education programs designed to provide opportunities for employees to advance in relation to the present and projected manpower needs of the agency and the employees’ career goals.</p> <p>4) The review of profiles of training course participants to ensure that</p>	<p>submission, including position descriptions, application forms, recruitment methods and sources, interview procedures, test administration and a determination of their nondiscriminatory impact and validity, educational prerequisites, referral procedures, and final selection methods;</p> <p>2) A narrative description and analysis of seniority practices and provisions, upgrading and promotion procedures, transfer procedures, and formal and informal training programs from the agency’s last EEP submission;</p> <p>3) A narrative description and analysis of procedures and practices regarding wages, salary levels, and other forms of compensation and benefits;</p> <p>4) A narrative description and analysis of disciplinary procedures and discharge and termination practices; and</p> <p>5) A reasonable assessment to determine if the employment of affected classes of persons is inhibited by external factors (e.g., not knowing where to apply for jobs, the availability of bilingual materials and information, etc.).</p> <p>The narrative descriptions and analyses should be presented in a detailed fashion. Where written, formal, or scored tests are used in the employment selection process, the agency should identify the test, describe the procedures followed in administering and scoring the test, the weight that is given to test scores, how a cut-off score is established, and whether the test has been validated to predict or measure job performance and if so, an assessment of its nondiscriminatory impact, and a description of validation study. All other selection procedures must comply with requirements of 29 CFR Part 1607. In general, the guidelines require that a selection procedure that has an adverse impact on the employment of minorities or women must be validated or otherwise justified as necessary for successful job performance, in accordance with procedures in the guidelines. These analyses must contain statistical data to document the impact of the employment practices by race, national origin, and sex. At a minimum, the analyses must contain the following:</p> <p>1) The number of individuals by race, national origin, and sex applying for employment within the past year. The number by race, sex, and national origin of those applicants who were offered employment and those who were actually hired;</p> <p>2) The number of employees in each job category, by race, national origin, and sex who have applied for promotion or transfer within the past year. The number in each job category, by race, national origin, and sex who were promoted or transferred; and</p> <p>3) The number of disciplinary actions and terminations, by race, national origin, and sex within the past year. The number and types of</p>
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	<p>training opportunities are being offered to all eligible employees on an equal basis and to correct any inequities discovered.</p> <p><u>Layoffs, recalls, discharges, demotions & disciplinary actions</u></p> <p>The standards for deciding when a person shall be terminated, demoted, disciplined, laid off or recalled should be the same for all employees, including minorities and females. Seemingly neutral practices should be reexamined to see if they have disparate effect on such groups. For example, if more minorities and females are being laid off because they were the last hired, then, adjustments should be made to assure that minority and female ratios do not decrease because of these actions.</p> <ol style="list-style-type: none">1) When employees, particularly minorities and females, are disciplined, laid off, discharged or downgraded, it is advisable that the actions be reviewed by the AA Officer before they become final.2) Any punitive action (i.e., harassment, terminations, demotions), taken as a result of employees filing discrimination complaints, is illegal.3) The following records should be kept to monitor this area of the internal EEO program: <u>On all terminations</u>, including layoffs and discharges: indicate total number, name, (home address and phone number), employment date, termination date, recall rights, sex, racial/ethnic identification (by job category), type of termination and reason for termination. <u>On all recalls</u> indicate total number, name, (home address and phone number) recall date, sex, and racial/ethnic identification (by job category). <u>Exit interviews</u> should be conducted with employees who leave the employment of the SHA.	<p>disciplinary actions and terminations (e.g., indefinite supervision, loss of pay, demotion, etc.).</p>
<p><i>Sec. 46-.68-43 Identification of Problem Areas</i></p> <p>Where an occupational category, position classification within an occupational category employing a significant number of less than eighty percent (80%) of the selection rate for the group with the highest rate is substantially different for the purpose of Sections 46a-68-31 through 46a-68-74, inclusive, and constitutes adverse impact. Adverse impact tests for data contained in the Applicant Flow Analysis and Employment Process Analysis shall be conducted in the following manner:</p> <p><u>Adverse Impact Test 1</u> – the qualified applicant pool for each race/sex group shall be compared to the availability of the group in the relevant labor market area for employment.</p> <p><u>Adverse Impact Test 2</u> – the passing rate for each race/sex group passing the examination shall be compared to the rate for the same group taking the examination.</p> <p><u>Adverse Impact Test 3</u> – the interview rate for each race/sex group shall be compared to the rate for the same group on the employment or reemployment list.</p>	<p><i>Identification of Problem Areas</i></p> <p>Included in Employment Analysis Section above.</p>	<p><i>Identification of Problem Areas</i></p> <p>Refer to Employment Analysis Section above.</p>

<p><u>Adverse Impact Test 4</u> – the hire rate for each race/sex group shall be compared to the interview rate for the same group.</p> <p><u>Adverse Impact Test 5</u> – the hire rate for each race/sex group shall be compared to the rate for the same group in the applicant pool.</p> <p><u>Adverse Impact Test 6</u> – the reduction in force rate for each race/sex group shall be compared to the rate for the group least affected by the personnel action.</p>		
<p><i>Sec. 46a-68-44 Program Goals and Timetables</i></p> <p>(a) Where an agency has identified under (Identification of Problem Areas) any employment policy or practice adversely affecting protected race/sex group members, they physically disabled or older persons, it shall develop and implement a program goal affirmatively utilizing provisions of Chapter 67 of the Connecticut General Statutes to erase the disparity. To the extent that Chapter 67 of the Connecticut General Statutes confers authority on the Department of Administrative Services, the agency shall notify, in writing, the Department of Administrative Services of any adverse impact found and request assistance in establishing a goal to remove the adverse impact.</p> <p>(b) Where an agency has identified, under (Identification of Problem Areas) any selection device having an adverse impact on protected race/sex group members, it shall, at a minimum, implement the specific program goals set out below by affirmatively utilizing the provisions of Chapter 67 of the Connecticut General Statutes. To the extent that chapter 67 of the Connecticut General Statutes confers authority on the Department of Administrative Services, the agency shall notify, in writing, the Department of Administrative Services of any adverse impact found and goal established and request the department’s affirmative assistance in realizing the goal established pursuant to the section. The Department of Administrative Services shall affirmatively perform its duties under Chapter 67 of the Connecticut General Statutes to assist agencies in attaining the goals established pursuant to this section. The absence of such program goals shall be excused only if the agency has been approved bona fide occupational qualification application, as provided for in Section 46a-68-63 (Bona fide Occupation Qualification Determination), or where the agency demonstrates, and the commission finds that such goals are contraindicated by sample size, statistical significance, technical feasibility or other compelling factor. The following goals are otherwise required under this subsection:</p> <p><u>Adverse Impact Test 1</u> – If it is indicated that the representation for any group in the applicant pool is less than eighty percent (80%) of its representation in the availability base in the relevant labor market area, the agency shall establish a program goal go intensify its recruitment efforts to</p>	<p><i>Program Goals and Timetables</i></p> <p>Included in Hiring/Promotional Goals and Timetables Section above.</p>	<p><i>Program Goals and Timetables</i></p> <p>Refer to Hiring/Promotional Goals and Timetables above.</p>

attract more persons of disadvantage groups as applicants, review the specifications for the position or position classification to assure that they accurately reflect the duties and responsibility of the job or make a range of training opportunities available to any such disadvantage group.

Adverse Impact Test 2 – If it is indicated that the pass rate for any group is less than eighty percent (80%) of the highest pass rate, the agency shall produce evidence that such examination is criterion valid. In the absence of such evidence, the agency shall request state personnel division to professionally review the examination in question to assess its validity or devise a new examination. If such examination is found to be invalid, the agency shall adopt a program to discontinue use of the examination, and to request the personnel division to discontinue any employment list based in whole or in part upon the results of such test and construct a new valid examination.

Adverse Impact Test 3 – If it is indicated that the interview rate for any race/sex group is less than eighty percent (80%) of the highest interview rate, the agency shall detail what efforts it has made or will take to reach protected groups on the employment or reemployment list and shall identify, as a program goal, a plan to do so. Additionally, the agency shall detail what efforts it has made or will take to preserve employment opportunity for such groups in the future and shall identify, as a program goal, a plan to make future hires from those disadvantage groups appearing on the list.

Adverse Impact Test 4 – If it is indicated that the hire rate for any race/sex group is less than eighty percent (80%) of the highest hire rate, the agency shall detail the reasons for its selection of each persona hired and, as a program goal, critique its interview process to determine the viability of its procedure.

Adverse Impact Test 5 – If it is indicated that the hire rate for any group is less than eighty percent (80%) of the highest hire rate, the agency shall, as a program goal, subject its hiring process to intense scrutiny to determine whether any factor in addition to or in conjunction with hose identified in subparagraphs (1) through (4) above has contributed to the imbalance and, if so, devise appropriate remedial measures.

Adverse Impact Test 6 – If it is indicated that the impact ratio for any race/sex group is less than 0.8, the agency shall provide evidence of substantial justification for the resulting disparity and shall provide, as a program goal, a plan to mitigate such results in the future.

In addition to any program goal adopted pursuant to subsections (a) or (b) herein, each agency shall carefully consider the feasibility of implementing one or more of the measures set out below to erase the disparity identified: establishment of recruitment and training programs, the creation of

<p>cancellation of positions or position classifications or the filling of vacancies; continuous recruitment of applicants, the continuance or cancellation of employment lists, compensation for performance of duties of higher job classification, extension of employment list, alteration of examination processes, consideration of volunteer experience in partial fulfillment of training and experience requirements, making open competitive appointments rather than promotional appointments where promotional appointments from the internal labor market area would perpetuate underutilization, appointments pursuant to Section 5-234 (a) and (b) of the Connecticut General Statutes, use of provisional, temporary, emergency and intermittent appointments, merit promotion system appointments, special training courses for employees, upward mobility training, use of job sharing arrangements and flex time, day care and requests for review and alteration of job specifications where they have an adverse impact on protected classes.</p>		
<p>Sec. 46a-68-45 Upward Mobility Each agency shall establish an upward mobility program as part of its affirmative action plan. Programs shall be consistent with the guidelines prepared by the committee on upward mobility and shall: insure that the race and sex composition of program participants is consistent with affirmative action, provide career counseling opportunities, make a range of training opportunities available, initiate classification requests that would result in the development of career ladders and lattices to improve mobility for subprofessional positions, establish specific goals and timetables separate from those goals required elsewhere, inclusive on the number of positions in entry level classes to be filled through upward mobility, programs should meet or exceed the minimum degree of compliance expected by the guidelines and agencies shall demonstrate initiative in the development and implementation of upward mobility programs, upward mobility efforts shall be monitored by the commission as part of the affirmative action plan review and agency efforts shall be evaluated in quantifiable terms such as the number of program participants identified by race/sex and the number of persons participating in upward mobility training identified by race/sex and extent of career counseling opportunities, number of career counseling sessions and number of persons in attendance, new career ladders established, number of target positions established or identified, elimination or revision of artificial or nonjob-related qualification requirements, frequency of reporting recommendations to the Department of Administrative Services to allow alternative qualifications in cases of demonstrated ability to perform work successfully at higher level position, number of requested positions as a result of conducting job analyses, number of upward mobility enrollees promoted identified by race/sex, sufficiency of goals and timetables between or</p>	<p>Upward Mobility Programs and Goals 1) Career counseling and guidance to employees. 2) Creating career development plans for lower grade employees who are underutilized or who demonstrate potential for advancement. 3) Widely publicizing upward mobility programs and opportunities within each work unit and within the total organizational structure.</p>	<p>Upward Mobility Programs and Goals 1) Reviewing the qualifications of all employees to assure that minorities, handicapped persons, and women are given full opportunities for transfers, promotions, training, salary increases, and other forms of compensation. 2) Conducting and supporting career counseling for all employees.</p>

within all categories, success in meeting goals and timetables, level of compliance with the committee guidelines and degree of innovation in establishing programs and goals beyond those required by the committee guidelines.		
<p><i>Sec. 46a-68-46 Grievance Procedure</i></p> <p>The plan shall establish a system to process and resolve employee allegations of discrimination. Such system shall provide for the expeditious resolution of grievances to assure that legal options for filing complaints with enforcement agencies are not foreclosed. The grievance procedure shall include: Periodic training in counseling and grievance investigation for agency counselors, confidential counseling and procedures for informal resolution at the agency level by the affirmative action officer, notice to employees that an agency grievance procedure is available, a guarantee of nonretaliation for the exercise of rights granted pursuant to this section, advisement of legal options to file complaints with the CHRO, EEOC, U.S. Labor Department Wage and Hour Division and any other agencies, state, federal or local that enforce laws concerning discrimination in employment; and time frames not to exceed 90 days for filing, processing and resolution of such matters, all records of grievances and dispositions thereof shall be maintained and reviewed on a regular basis by the affirmative action officer to detect any patterns in nature of grievances and records so retained shall be confidential except where disclosure is required by law and the plan shall contain a summary of the matters alleged, the results thereof and the length of time required to resolve the grievance. Where informal allegations have resulted in complaints to enforcement agencies, the plan shall provide information on the number of such complaints, investigation agency, where such matter is currently pending or the outcome thereof. All records relevant to employee grievances filed under this section shall be maintained by the agency for examination by the commission.</p>	<p><i>Grievance Procedure</i></p> <p>The AAP should include specific provisions for, but not necessarily limited to:</p> <ol style="list-style-type: none">1) Assuring that information on EEO counseling and grievance procedures is easily available to all employees.2) A system for processing complaints alleging discrimination because of race, color, religion, sex or national origin to an impartial body.3) A system for processing grievances and appeals (i.e., disciplinary actions, adverse actions, adverse action appeals, etc.).	<p><i>Grievance Procedure</i></p> <ol style="list-style-type: none">1) The EEO program should include a component where applicants and employees have the right to file complaints alleging discrimination with the appropriate official.2) The AAO should have sensitivity to, and an awareness of, the varied ways in which discrimination occurs, knowledge of civil rights precepts, policies, rules, regulations, and guidelines.3) Processing employment discrimination complaints4) The number of disciplinary actions and terminations, by race, sex, national origin within the past year. The number and types of disciplinary actions and terminations (e.g., indefinite supervision, loss of pay, demotion, etc.).
<p><i>Sec. 46a-68-47 Internal Program Evaluation</i></p> <p>Each agency shall develop an internal evaluation procedure to monitor progress and anticipate shortcomings in the affirmative action program. Each internal program evaluation shall, at a minimum, have written input from the appointing authority, affirmative action officer and employee advisory committee. The following considerations are integral to that effort: ongoing review and evaluation of the affirmative action plan, updating goals and objectives to meet the agency's changing employment situation, establishing a system for evaluating supervisor's performance on affirmative action, developing a reporting system to monitor affirmative action progress and maintaining written progress reports, assessing the effectiveness and results of the affirmative action plan and its implementation and establishing mechanisms. As part of the plan, each</p>	<p><i>Internal Program Evaluation</i></p> <p>An internal reporting system to continually audit, monitor and evaluate programs is essential for a successful AAP. Therefore, a system providing for EEO goals, timetables, and periodic evaluations needs to be established and implemented. Consideration should be given to the following actions:</p> <ol style="list-style-type: none">a) Defining the major objectives of EEO program evaluation.b) The evaluation should be directed toward results accomplished, not only at efforts made.c) The evaluation should focus attention on assessing the adequacy of problem identification in the AAP and the extent to which the specific action steps in the plan provide solutions.d) The AAP should be reviewed and evaluated at least annually. The review and evaluation procedures should include, but not be limited to	<p><i>Internal Program Evaluation</i></p> <p>Establishment of an effective and workable internal monitoring and reporting system. This system should serve the following basic purposes:</p> <ol style="list-style-type: none">1) Assessing EEO accomplishments;2) Enabling the agency to evaluate the EEO program during the year and to take any necessary correction action regarding the development and execution of the programs or goals and timetables;3) Identifying those units which have failed to achieve a goal or to implement affirmative action; and4) Providing a precise and factual data base for future projections. <p>The reporting system should provide documentation to support actions that affect minority and women job applicants or employees. Management should be kept informed of program effectiveness. The creation of an EEO</p>

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agency shall outline the steps it has taken to create an internal evaluation procedure and the results of the internal review for the reporting period. All writings pertaining to each program evaluation shall be retained in-house for examination by the commission.	the following: 1) Each bureau, division or other major component of the agency should make annual and such other periodic reports as are needed to provide an accurate review of the operations of the AAP in that component. 2) The AAO should make an annual report to the head of the SHA, containing the overall status of the program, results achieved toward established objectives, identity of any particular problems encountered and recommendations for corrective actions needed. e) Specific numerical goals and objectives should be established for the ensuing year. Goals should be developed for the SHA as a whole, as well as for each unit and each job category.	advisory committee, reflective of all segments of the community and the agency's work force, can be an effective tool in this regard.
<i>Sec. 46a-68-48 Goals Analysis</i> Each agency shall prepare a narrative report on all activity undertaken to achieve the hiring, promotion, upward mobility and program goals contained in the previous affirmative action plan and a critical self-analysis of the progress made toward those ends. Each goal shall be separately addressed and the discussion of each action taken in furtherance thereof shall be detailed, searching and complete. If the analysis reveals additional problem areas or finds any currently course of action ineffective, the agency shall undertake corrective action.	<i>Goals Analysis</i> Included in Employment Analysis Section above.	<i>Goals Analysis</i> Included in Employment Analysis Section above.
<i>Sec. 46a-68-49 Innovative Programs</i> The development and implementation of programs not covered elsewhere is an important part of the road to affirmative action. Accordingly, within the framework of the affirmative action plan is an open invitation to each agency to structure innovative, comprehensive programs to create opportunities not otherwise available to achieve the full and fair participation of all protected group members. Such programs include: utilization of noncompetitive positions, summer employment programs, youth programs, apprenticeship or intern programs, work-study programs, job sharing arrangements internships, day care programs, creation of new positions, reassignments or any positive, result-oriented program designed to achieve affirmative action. The plan shall describe any program planned or operated pursuant to this section and report the results achieved.	<i>Innovative Programs</i> Not a requirement.	<i>Innovative Programs</i> Not a requirement.
<i>Sec. 46a-68-50 Concluding Statement</i> An affirmative action plan shall contain a concluding provision: stating that the appointing authority has read the submission and that the contents thereof are true and correct to the best of his or her knowledge and belief, and pledging the appointing authority and agency to make every good faith effort to achieve the objectives, goals and timetables set forth in the plan. The concluding statement shall be signed and dated by the appointing authority.	<i>Concluding Statement</i> Not a Requirement.	<i>Concluding Statement</i> Not a Requirement.

Sec. 46a-68-52 Annual Filing Standards

- a) Once the commission has formally approved an AAP pursuant to Section 46a-68-62, an agency may petition to file future plans on an annual basis. The following factors shall determine whether an agency shall file on an annual, rather than semiannual schedule:
- 1) The timeliness of prior submissions;
 - 2) The degree to which prior plans are in compliance with applicable law and Sections 46a-68-31 through 46a-68-74, inclusive; and
 - 3) Whether the agency has demonstrated every good faith effort to achieve the goals of the plan.
- b) The commission may rescind the annual file privilege at any time for failure to maintain the level of performance required in subsection (a) of this section.

Filing Standards

The AAO should make an annual report to the head of the SHA containing the overall status of the program, results achieved toward established objectives, identity of any particular problems encountered and recommendations for corrective actions needed. Specific numerical goals and objectives should be established for the ensuing year. Goals should be developed for the SHA as a whole, as well as for each unit and each job category.

Filing Standards

Submit an updated EEO submission on a triennial basis or as major changes occur in the work force or employment conditions. At the discretion of the UMTA Office of Civil Rights, less information may be requested where the recipient's previously submitted EEO program has not changed significantly.